

PIPER & MARBURY

L.L.P.

1200 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036-2430

WRITER'S DIRECT NUMBER
(202) 861-6477
FAX: (202) 223-2085
Rlowe@pipermar.com

202-861-3900
FAX: 202-223-2085

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December 10, 1998

BY HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, DC 20554

RECEIVED

DEC 10 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RM-9108

Re: Docket No. RM9108
Ex Parte Presentation

Dear Ms. Roman Salas:

Pursuant to Section 1.1206 of the Commission's rules, this is to advise you that, in my capacity as counsel to Long Distance International Inc. ("LDI"), a provider of 1010XXX service, I, along with representatives of LDI met yesterday with Kevin J. Martin, Legal Advisor to Commissioner H. Furchtgott-Roth.

During this meeting, we discussed LDI's position with respect to the inability of interexchange carriers to identify incumbent local exchange carriers or competitive local exchange carriers for casual calls. A copy of the following enclosures were submitted to Mr. Martin:

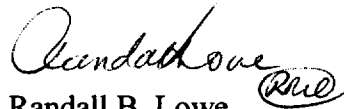
- An LDI memorandum entitled "Casual Calling Problem" and
- An LDI written presentation describing LDI's business operations, outlining the casual calling problem, and setting forth possible solutions.

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Ms. Magalie Roman Salas
December 10, 1998
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In accordance with the Commission's rules, I am hereby submitting one original and one copy of this letter and its enclosures for the above-referenced proceeding.

Sincerely,


Randall B. Lowe

RBL/deb

Enclosures

cc(w/o encl.): Kevin J. Martin
Dorothy Attwood
Jonathan B. Mirsky
Len Sawicki

LONG DISTANCE INTERNATIONAL INC.



Notes:

LONG DISTANCE
INTERNATIONAL INC.

10/20/92

CASUAL CALLING

10/20/92

RANDY SEEVAALOE
DIRECTOR REGULATORY AFFAIRS
LONG DISTANCE INTERNATIONAL INC.

CASUAL CALLING "NIGHTMARES"

10/20/92

FACT
OR
FICTION!

Notes:

LONG-DISTANCE INTERNATIONAL INC.

.. WHO ARE WE

- ..
- ..
- ..
- ..

LONG-DISTANCE INTERNATIONAL INC.

.. WHY DO I CARE ABOUT CASUAL CALLING

- ..
- ..
- ..
- ..

MAJOR "CHALLENGES"

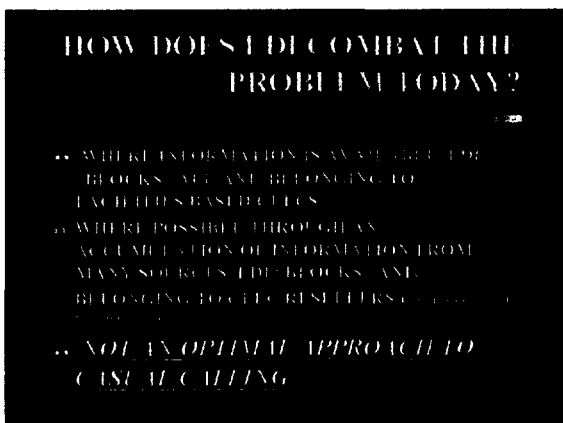
.. CHALLENGES CAUSED BY THE FOLLOWING

- ..
- ..
- ..
- ..

Notes:







Notes:

PROPOSED SOLUTIONS

•• SHORT TERM

- Build an "affordable" database similar to FIDB accessible to all carriers
- Billing and Collection Agreements with CLECs and CLEC Resellers
- Billing and Collection Agreements with carriers and CLECs
- CLEC Reseller of the Unpaid Port INCs - casual caller bills

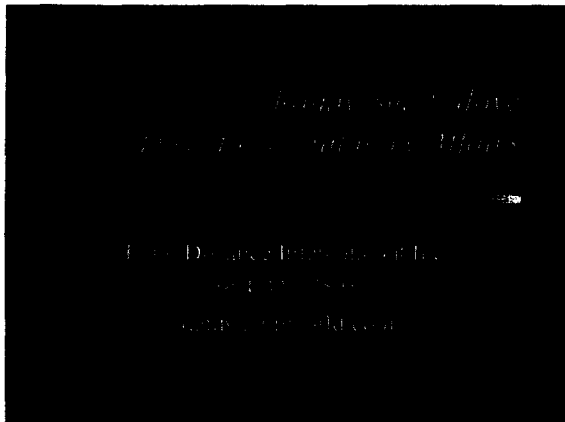
PROPOSED SOLUTIONS

•• LONG TERM

- Build an "affordable" database similar to FIDB accessible to all carriers
- Billing and Collection Agreements with CLECs and CLEC Resellers

THE "NIGHTMARE"

- PERPETUATION OF TRAD
- BLOCKING OF ANIS
- LESS CONSUMER CHOICE
- POSSIBLE EXTINCTION OF CASUAL CALLING



Notes:

CASUAL CALLING PROBLEM

PROBLEM

- The inability of interexchange carriers ("IXCs") to identify the incumbent local exchange carrier ("ILEC") or competitive local exchange carrier ("CLEC") for casual calls (*i.e.*, 1010XXX, 0⁺, 0⁻) thereby not allowing IXCs to determine whether it has a billing arrangement with the ILEC or CLEC which has the potential of encouraging consumer fraud.

REASON

- With the introduction of competition to the local exchange and associated policies such as resale and local number portability, NPA-NXXs can no longer be identified with a particular ILEC or CLEC.

SOLUTIONS

- A ten-digit line number data base, such as LIDB, that identifies an ILEC and CLEC.
- Require cost effective, non-discriminatory billing solutions, *i.e.*, require each LEC to offer billing and collection services at a reasonable prices.
- Realizing that the implementation of a ten digit line number data base may be time consuming, as an interim measure, require ILECs and CLECs to provide IXCs with a means by which to identify telephone numbers which they serve and, if necessary, protect such information by treating it as consumer proprietary network information. (47 U.S.C. § 222 (b), (c) 1996; 47 C.F.R. § 64.2005).

CONCLUSION

- Absent an interim or long-term solution, customer choice through casual calling will become unavailable thus resulting in IXCs being forced to block such calls. In the process, the growth of ILECs, CLECs and IXCs will be inhibited.
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